

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SEQUAN JACKSON,
a/k/a "Supa,"

Defendant.

*Ordered
Unsealed*
~~SEALED SUPERSEDING
INFORMATION~~

S2 22 Cr. 352 (JSR)

SO ORDERED:

[Signature]
U.S.D.J.

6-3-24

COUNT ONE
(Racketeering Conspiracy)

The United States Attorney charges:

Overview

1. From at least in or about 2019 through at least in or about June 2022, SEQUAN JACKSON, a/k/a "Supa," the defendant, and others known and unknown, corrupted the operations and activities of First Response Cleaning Corp. and other related corporate entities (collectively, "First Response"). First Response is an emergency mitigation services ("EMS") company, which provides clean-up services to properties damaged by fire. The defendant and his co-conspirators used First Response as a vehicle to extort other EMS companies, to extort other participants in the fire restoration industry, and to assert control over the industry using violence and threats of violence.

Relevant Background

2. When properties suffer fire damage, property owners often hire an EMS company to clean up the damaged property, which includes sweeping up, removing debris, and ventilating the property. Adjusters are another component of the fire restoration industry.

3. Property owners typically rely upon adjusters, either a "public adjuster" or an "independent adjuster," to investigate, process, and submit the insurance claims to their